

JONATHAN K. LEVINE (SBN 220289)
jkl@pritzkerlevine.com
ELIZABETH C. PRITZKER (SBN 146267)
ecp@pritzkerlevine.com
PRITZKER LEVINE LLP
180 Grand Avenue, Suite 1390
Oakland, CA 94612
Telephone: (415) 692-0772
Facsimile: (415) 366-6110

DANIEL C. GIRARD (SBN 114826)
dcg@girardgibbs.com
ELIZABETH A. KRAMER (SBN 293129)
eak@girardgibbs.com
ANDRE M. MURA (SBN 298541)
amm@classlawgroup.com
GIRARD GIBBS LLP
601 California Street, Suite 1400
San Francisco, CA 94104
Telephone: (415) 981-4800
Facsimile: (415) 981-4846

ALEXANDRA P. SUMMER (SBN 266485)
asummer@cpmlegal.com
STEPHANIE D. BIEHL (SBN 306777)
sbiehl@cpmlegal.com
COTCHETT, PITRE & MCCARTHY, LLP
San Francisco Airport Office Center
840 Malcolm Road, Suite 200
Burlingame, CA 94010
Telephone: (650) 697-6000
Facsimile: (650) 697-0577

Class Counsel

[Additional Counsel Appear on Signature Pages]

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NORTHERN CALIFORNIA
OAKLAND DIVISION**

IN RE: LENOVO ADWARE LITIGATION

This Document Relates to All Cases

Case No. 4:15-md-02624-HSG

JOINT STIPULATION AND ~~PROPOSED~~
FURTHER CASE MANAGEMENT ORDER

Courtroom: 2, 4th Floor
Judge: Hon. Haywood S. Gilliam, Jr.

In mid-January 2018, the parties contacted Magistrate Judge Corley to set a date for a further settlement conference in this matter. While the parties originally contemplated a settlement conference occurring in February or early March 2018, the earliest date that was available for Magistrate Judge Corley, the parties and their respective counsel for an in-person conference was March 28, 2018. The

1 parties are now scheduled to have a preliminary telephonic settlement conference with Magistrate
2 Judge Corley on March 1, 2018, to be followed by an in-person settlement conference on March 28,
3 2018 [Dkt. No. 211].

4 On January 30, 2018, the Court entered its order granting, with leave to amend, Lenovo's
5 motion to dismiss plaintiffs' claim under New York State law [Dkt. No. 210]. The order provided that
6 any amended complaint be filed by plaintiffs by February 28, 2018, that a joint case management
7 conference statement be filed by March 5, 2018, and that there will be a case management conference
8 on March 12, 2018.

9 In light of the upcoming settlement conferences in March 2018, the parties have conferred and
10 agree that, subject to Court approval, a modest extension of the deadlines set forth in the Court's
11 January 30, 2018 order would allow the parties in the short term to focus on settlement efforts while
12 conserving judicial resources.

13 Subject to Court approval, the parties propose the following schedule:

14	March 1, 2018	Telephonic settlement conference with Magistrate Judge Corley
15	March 28, 2018	In-person settlement conference with Magistrate Judge Corley
16	April 2, 2018	Case management conference statement due
17	April 9, 2018	Case management conference
18	April 16, 2018	Amended complaint filed

19 The parties will advise the Court of the status of the settlement discussions in their case
20 management conference statement and will propose an overall case schedule at that time unless the case
21 has been resolved or substantial progress towards settlement has been made.

22 .
23 IT IS SO STIPULATED.

24
25 Dated: February 20, 2018

PRITZKER LEVINE LLP

/s/ Jonathan K. Levine
Jonathan K. Levine (SBN 220289)
Elizabeth C. Pritzker (SBN 146267)
180 Grand Avenue, Suite 1390
Oakland, California 94612

Telephone: (415) 692-0772
Facsimile: (415) 366-6110
jkl@pritzkerlevine.com
ecp@pritzkerlevine.com

GIRARD GIBBS LLP

/s/ Daniel C. Girard

Daniel C. Girard (SBN 114826)
Elizabeth A. Kramer (SBN 293129)
Andre M. Mura (SBN 298541)
601 California Street, Suite 1400
San Francisco, CA 94104
Telephone: (415) 981-4800
Facsimile: (415) 981-4846
dgc@girardgibbs.com
eak@girardgibbs.com
amm@classlawgroup.com

**COTCHETT, PITRE & McCARTHY,
LLP**

/s/ Alexandra P. Summer

Alexandra P. Summer (SBN 266485)
Stephanie D. Biehl (SBN 306777)
San Francisco Airport Office Center
840 Malcolm Road, Suite 200
Burlingame, CA 94010
Telephone: (650) 697-6000
Facsimile: (650) 697-0577
asummer@cpmlegal.com
sbiehl@cpmlegal.com

Class Counsel

K&L GATES LLP

/s/ Daniel J. Stephenson


Daniel J. Stephenson (SBN 270722)
10100 Santa Monica Blvd., 7th Floor
Los Angeles, CA 90067
Telephone: (310) 552-5000
Facsimile: (310) 552-5001
Dan.stephenson@klgates.com

Counsel for Defendant Lenovo

Pursuant to the Parties' Stipulation and for good cause shown,

IT IS SO ORDERED except the case management conference will be held on April 10, 2018 at 2:00 p.m.

Dated: 2/21/2018


Hon. Haywood S. Gilliam, Jr.
United States District Judge